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No. ____

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IN THE

Supreme Court of the United States

OCTOBER TERM, 1981

In re MARILYN RICE

Concerning A Matter In
The District Of Columbia Court Of Appeals

PETITION FOR A WRIT OF MANDAMUS

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OBJECTIVE OF PETITION

This petition seeks a writ of mandamus to compel three judges of an appeals court to rule on the issue that was presented to them for review.

*

The judges against whom relief is sought are the following, of the District of Columbia Court of Appeals:

The Honorable Julia Cooper Mack, Associate Judge

The Honorable William C. Pryor, Associate Judge

The Honorable Hubert B. Pair, Associate Judge, Retired

PARTIES INVOLVED

The action out of which this petition grows is *Marilyn Rice* v. *Dr. John E. Nardini and the Psychiatric Institute of Washington*, No. 81-996, in the District of Columbia Court of Appeals.

Also to be considered parties in the sense that the action intimately concerns them are the following attorneys:

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Peter R. Sherman, Esq.

Philip G. Sunderland, Esq.

Bruce J. Terris, Esq.

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28 U.S.C. 1257 2

28 U.S.C. 1257(3) 3

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PETITION FOR A WRIT OF MANDAMUS

BASIS OF SUPREME COURT JURISDICTION

The jurisdiction of the Supreme Court is invoked under 28 U.S.C. 1651(a).

> "The Supreme Court and all courts established by Act of Congress may issue all writs necessary or appropriate in aid of their respective jurisdictions and agreeable to the usages and principles of law."

*

Supreme Court Rule 26 requires that an extraordinary writ, such as a writ of mandamus, should be in aid of the Supreme Court's appellate jurisdiction.

The writ that petitioner requests would conform with this requirement in two different but related senses—first as concerns a class of cases where deprivation of federal rights escapes remedy, and second as concerns the particular facts of petitioner's particular case in a state court.

(1)

The U.S. Supreme Court has the power and duty to enforce the United States Constitution. Through a series

of early rulings, principally *Marbury v. Madison* in 1803, the Supreme Court established itself as the final authority as to whether a law or action conforms with the letter or intent of the Constitution. Its eminence in this regard is normally exercised by appellate review of cases from other courts. Acknowledgment of such appellate jurisdiction over the federal court system is now embodied (mainly) in 28 U.S.C. 1254, and over the state court systems, including that of the District of Columbia, in 28 U.S.C. 1257, which statutes the Supreme Court interprets.

The requested writ would be in aid of the Supreme Court's appellate jurisdiction *in all courts, federal and state* in that it would, for the first time, recognize and remedy a form of judicial partiality that could become operative in any court. Only exceptional circumstances bring this partiality into play but, when activated, it tends to void the equal protection of the laws to which citizens are entitled under the Constitution.[1] This is

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[1] The first section of the Fourteenth Amendment provides: "All persons born or naturalized in the United States, and subject to the jurisdiction thereof, are citizens of the United States and of the State wherein they reside. No State shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States; nor shall any State deprive any person of life, liberty, or property, without due process of law; nor deny to any person within its jurisdiction the equal protection of the laws."

Strictly speaking, the Equal Protection Clause of the Fourteenth Amendment refers only to the states. It prohibits denial of equal protection by their legislative, executive, or judicial authorities but does not prohibit denial by the corresponding federal authorities. However, where necessary, the Due Process Clause of the Fifth Amendment, which does refer to actions by federal authorities, is construed as broad enough to comprehend a guarantee of equal protection.

especially so as the person denied protection cannot obtain relief in any other form or from any other court.

Further discussion of this "loophole" situtation is postponed to the section of this petition entitled "A Nationwide and Profession-wide Problem."

(2)

The requested writ of mandamus would also be in aid of the Supreme Court's appellate jurisdiction in the narrower sense that petitioner's particular case, which comes from a state court, can be construed as containing a "federal question" within the terms of 28 U.S.C. 1257(3). This code section gives the U.S. Supreme Court appellate jurisdiction over a state court

> "where the validity of a treaty or statute of the United States is drawn in question or where the validity of a state statute is drawn in question on the ground of its being repugnant to the Constitution, treaties or laws of the United States, or where any title, right, privilege or immunity is specially set up or claimed under the Constitution, treaties or statutes of, or commission held or authority exercised under, the United States."

It happens that the question petitioner presented to the D.C. Court of Appeals for review, and which that court refused to rule on, asked for interpretation of a U.S. Supreme Court doctrine, but this presumably would not be a federal question within the purview of the code section because it does not draw in question a U.S. statute or treaty.

However, the case turned, so to speak, on a different question, and one that directly involved constitutional rights. This question was "specially set up" in the Appellant's Reply Brief of petitioner. Here petitioner, having reason to fear that the D.C. Court of Appeals would avoid

ruling fairly on the issue presented, specifically asked whether the court could rule without bias in the circumstances. In effect she was claiming a "right . . . under the Constitution," a right to equal treatment or protection. At the time, petitioner, a layman, had no foresight of this petition to the Supreme Court or that such a question could be relevant or that it should be couched in such and such a way, but she was reminding the judges of her right to a disinterested ruling in a situation where the facts and law were cut and dried and the only real question was with regard to their own partiality.

She believes that the following passage from *Green Bay & Mississippi Canal Company* v. *Patten Paper Company*, 172 U.S. 58, 67 (1898), well expresses the latitude of discretion the Supreme Court may exercise if it chooses in recognizing a claim to federal rights:

> "No particular form of words or phrases has ever been declared necessary in which the claim of Federal rights must be asserted. It is sufficient if it appears from the record that such rights were specially set up or claimed in the state court in such manner as to bring it to the attention of that court."

From the record to be presented in this petition, the Court may judge whether federal rights were asserted (and denied).

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As required by Supreme Court Rule 27, there is appended hereto (as Exhibit D) a copy of the judgment in respect of which this writ is sought, namely the District of Columbia Court of Appeal's *Memorandum Opinion and Judgment*, filed April 8, 1982. See also petitioner's ensuing *Motion for a Ruling on the Issue Presented for Review*, April 19, 1982 (Exhibit E); and the Court's *Order* denying the motion, May 5, 1982 (Exhibit F).

STATEMENT OF THE CASE

Petitioner is a former economist, accountant, and statistician, now retired as the result of iatrogenic injuries. These were the occasion of a medical malpractice suit in the Superior Court of the District of Columbia, *Marilyn Rice v. Dr. John E. Nardini and the Psychiatrict Institute of Washington*, CA 703-74, decided for the defendants in January 1977.

Since that time, petitioner has sought to expose the trial of the case as a completely fraudulent proceeding. Many prominent doctors and lawyers were involved, and her efforts have not been welcomed in the medical and legal communities—indeed, have uniformly met with rebuffs. Her allegations have now led to a similar situation with three appeals court judges. They refuse to rule on the proper procedure for making a formal legal complaint.

As the nature of the fraud (more exactly, of petitioner's allegations) is of importance in connection with the judges' refusal to rule, petitioner begins with the original fraud situation in sketching the events which have culminated in the judges' recalcitrance.

A sham trial

The subject fraud began long before the trial, most conspicuously in the defendants' production of newly-minted "records," to which petitioner's counsel, though informed of their spurious character by petitioner, raised no objection. Then, immediately prior to the trial, petitioner's counsel refused to argue her case. Thereupon a "trial" took place without an issue but with a great deal of entertainment as the medical witnesses on both sides pronounced the plaintiff insane and the attorneys on both sides presented spurious documentary evidence to prove the charge. In this way were her serious allegations in the case invalidated.

There was much more to this fraud than the false documents but petitioner has constantly emphasized them because fraud in such form is elementary and concrete. Fraud via voluminous forged writings, a concocted X-ray, and a whole-cloth health insurance form is comprehensible to all, and a medical malpractice trial based on bogus medical records is a prima facie absurdity. Also, whereas words and even deeds are subject to vagaries of interpretation, these remarkable artifacts cannot be undone. They stand as a monument to what the doctors and lawyers would stoop to.

Complaint to the D.C. Board on Professional Responsibility

Among petitioner's complaints or reports of this fraud to numerous organizations having to do with medical or legal matters, one of the most insistent was to the D.C. Board on Professional Responsibility, which is a subsidiary body of the District of Columbia Court of Appeals.[2]

In 1978 petitioner filed with the Board a complaint against the five attorneys who had participated in the trial—two representing herself as plaintiff and three representing the defendants. The complaint is appended hereto as Exhibit A. In addition she sent at least ten follow-up communications to the Board, detailing aspects of the false records and/or other aspects of the fraud. She also made a related complaint against J. Joseph Barse, then president of the Bar Association of the District of Columbia, who had not participated in the trial but was highly implicated with one of the spurious documents.

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[2] This Board was formerly called the Disciplinary Board of the District of Columbia Bar.

The Board responded in July 1979 with some indignation that, in essence, it saw nothing wrong with basing a trial on false evidence.

Motion to set aside jury verdict for fraud upon the court

Ultimately petitioner learned from a layman that she could take the case into her own hands and might be able, under Superior Court Rule 60, to obtain nullification of the judgment in the case.

This Rule 60 of the Superior Court of the District of Columbia is the same as Rule 60 of the Federal Rules of Civil Procedure. It is an exact copy except for deletion of an inapplicable reference to the U.S. Code. Section (b) of the parent rule and of the adopted one states in six clauses and identical words the various grounds and relevant terms upon which relief from a final judgment may be had, and goes on to say that the rule does not limit the power of a court to set aside a judgment for "fraud upon the court."

The phrase "fraud upon the court" was eloquently connotative of the complete and thoroughgoing fraud that petitioner was alleging, and she therefore prepared an affidavit, assembled approximately 150 pages of exhibits in proof of her charges, and submitted this material with a *Motion to Set Aside Jury Verdict for Fraud Upon the Court*. This was in February 1981.[3] The covering motion, which accuses the five attorneys of perpetrating a "fraud upon the court," is appended hereto as Exhibit B.

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[3] At a later time, petitioner found the specifications for "fraud upon the court" laid out in the opinions in these recent cases: *Rozier* v. *Ford Motor Co.*, 573 F.2d 1332 (1978); *Kerwit Med. Products* v. *N. & H. Instruments*, 616 F.2d 833 (1980); and *Williams* v. *Board of Regents of Univ. of Ga.*, 90 FRD 140 (1981). In these cases no such fraud had occurred, but the opinions deal with the concept. Petition-

Denial and appeal—the question at issue

Judge Leonard Braman, who had presided at the instant trial, denied the motion for a procedural reason. He said that policy and procedure concerning "fraud upon the court" had been established by the U.S. Supreme Court in the case of *Hazel-Atlas Glass Co.* v. *Hartford-Empire Co.*, 322 U.S. 238 (1944) and that the "doctrine of *Hazel-Atlas*" calls for an independent action for making such a complaint.

Petitioner, after acquainting herself with this doctrine,[4] appealed, presenting the following single issue for review: "WHETHER THE DOCTRINE OF HAZEL-ATLAS, DEALING WITH FRAUD UPON THE COURT, CALLS FOR A MOTION PROCEDURE OR AN INDEPENDENT ACTION." She contended in her Appellant's Brief that her ancillary procedure had been correct and that Judge Braman's opinion that the doctrine calls for an independent action was in error.

Another question raised

The issue petitioner had presented for review seemed a very simple one. However, the Appellee's Brief ignored her own brief and apprised the Court of Appeals that its writer would like this action quashed. Petitioner then submitted an *Appellant's Reply Brief* which described the relations among the parties and raised the question of the Court's possible partiality, in view of its organizational relation with the D.C. Board on Professional Responsi-

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er's allegations far exceeded the requirements of attorney involvement, fabrication of evidence, unconscionable planning, etc. which are said to comprise "fraud upon the court" in these opinions.

[4] It is discussed in MOORE'S FEDERAL PRACTICE, Vol. 7, pages 64-68 and 505-515.

bility and the latter's demonstrated protective position toward the accused lawyers.

She asked "whether the Court would have an interest in supporting the Board's prior action." This was in a section of the Reply Brief entitled "The Court's Position."

The whole of the *Appellant's Reply Brief* is appended hereto as Exhibit C.

Opinion and judgment, D.C. Court of Appeals

The question as to whether the Court could consider her appeal without bias was not acknowledged but the answer became apparent in its *Memorandum Opinion and Judgment*, issued April 8, 1982 and appended hereto as Exhibit D.

In this paper the Judges Mack, Pryor, and Pair did not even mention the procedural issue presented for review. Instead they addressed the fraud itself and backed the Board's position.

Specifically, they affirmed the lower court's denial of petitioner's motion but on the ground that the complaint in it was of the least serious type of fraud redressable under Rule 60(b) and should have been barred by the corresponding time limit. This conclusion they purported to find in the provisions of Rule 60(b) together with precedential cases.

Motion for a ruling on the issue presented for review

Inasmuch as the Court had not actually ruled against her on the issue presented for review, nor even considered it, petitioner did not ask for a rehearing. Instead she filed a *Motion for a Ruling on the Issue Presented for Review*, registering in a supporting memorandum her objections to the Court's having bent facts and law to fit the contentions of an accused party, the lawyer who

wrote the Appellee's Brief. The covering motion is appended as Exhibit E.

The Court responded tersely with an *Order* denying the motion. This is Exhibit F.

All of the foregoing statement will be illuminated by a close perusal of the *Memorandum Opinion and Judgment* of April 8, 1982. It is but an artful burlesque of a judicial decision. As its nature is highly germane to this petition, petitioner demonstrates this in a line by line commentary which, for convenience of reference, is placed in proximity to the document itself as part of Exhibit D.

A NATION-WIDE AND PROFESSION-WIDE PROBLEM

The problem with which this petition deals is not at the level of the clauses and sections and doctrines of Rule 60(b). These have been made to appear as roadblocks to justice as the honest citizen understands it, but petitioner has negotiated these supposed obstacles with patient exactitude, only to be told by the D.C. Court of Appeals: *All rules are off when we are protecting fellow lawyers*. That is the burden of its ruling.

It is appropriate, then, to speak to the *real* problem.

Ethical partiality

The great strong professions of medicine and law are intensely cohesive. Members do not find fault with other members.

This principle has been stated in various ways in various medical codes of ethics. A physician who succeeds another in charge of a case "should not disparage, by

comment or insinuation, the one who preceded him."[5] A dentist who finds indisputable evidence of faulty treatment should "avoid reflection on the previous dentist or the dental profession."[6] An ethical physician "will avoid impugning the reputation of his confreres."[7] What these strictures mean for a patient who is badly injured by a doctor is that he cannot obtain treatment from another doctor.

The legal profession is not so crudely outspoken in its published pronouncements and may be a shade less unitary in fact, but the client injured by a lawyer soon finds that lawyers are defensive of each other too. It is for that reason that petitioner has not been able to obtain legal assistance in a cause that accuses lawyers, and therefore acts *pro se*.

If it be said that these cohesive professions provide grievance boards to which injured patients and clients may apply, then it must be pointed out that team members acting jointly are not less team-spirited than when acting singly.

We take for granted, in disputes in general, that little justice would result if one side's friends and relatives made up the judge and jury. Yet in these grievance arrangements of the self-governing professions, their own team members umpire disputes with outsiders. The result, as a knowledge of human nature would suggest and as petitioner can confirm from experience, is that the

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[5] American Medical Association *Principles of Medical Ethics*, 1971, Section 1, Paragraph 10.

[6] American Dental Association *Principles of Ethics*, 1972, Section 8.

[7] Canadian Medical Association *Code of Ethics*, Article 28.

grievance machinery is more protective than judicial, whether it be that of the American Medical Association, American Dental Association, American Psychiatric Association, or American Bar Association.

This much protectionism/exclusionism is common to medicine and law and it has been discussed here by way of background to a further element that is peculiar to the legal profession. The lawyers' team, besides its grievance machinery, has also control of the country's all-purpose governmental judicial machinery, so that it has the utmost power and opportunity to *cheat* in its own favor.

The D.C. Court of Appeals' refusal to rule on a simple procedural issue, and its gratuitous effort to prevent an investigation of fraud, were not an exercise in good faith of its public powers; they were the arbitrary action of three highly placed members of the American Bar Association in protection of members of the same trade association. They but continued the pattern of protectionism already exhibited by lawyers in general and by the Court's own Board on Professional Responsibility.

Constitutional obligation

At the beginning of this petition, petitioner referred to "a form of judicial partiality that could become operative in any court." She meant this ethical loyalty toward professional brothers, which is presumably latent in all judges everywhere and could come into play when a judge is confronted with a fellow lawyer's wrongdoing. In such a situation the judge has an inevitable conflict of interest, and how far he leans to accommodate or protect his brother is the measure of how far he displaces justice from the reach of the outsider to the club.

Such leaning, whether in legislative, executive, or judicial manifestation of law, it is the business of the Equal

Protection Clause of the Constitution to prevent. "The guaranty [of equal protection of the laws] was aimed at undue favor and individual or class privilege, on the one hand, and at hostile discrimination or the oppression of inequality, on the other." (*Truax* v. *Corrigan*, 257 U.S. 312, 332 (1921)).

Judges' ethical partiality is a definitional loophole in the ideal of equal protection. No one knows better than judges that partiality is antagonistic to justice, and it is for that reason that they recuse themselves in other situations that might elicit partiality, but here there is no one who is definitionally impartial to take their place.

Even so, the Supreme Court still has its obligation to enforce the Constitution. Such obligation, so far as state courts are concerned, was clearly expressed in *Shelley* v. *Kraemer*, 334 U.S. 1 (1948):

> Page 18. "From the time of the adoption of the Fourteenth Amendment until the present, it has been the consistent ruling of this Court that the action of the States to which the Amendment has reference includes action of state courts and state judicial officials. . . .
>
> Page 20. "And when the effect of that action is to deny rights subject to the protection of the Fourteenth Amendment, it is the obligation of this Court to enforce the constitutional commands."

This particular case *(Shelley v. Kraemer)* had to do with restrictive covenants against blacks in regard to housing. In it, the Supreme Court made a distinction between private and public wrong that would seem relevant also to medical/legal discriminations against outsiders.

> Page 1. "Private agreements to exclude persons of designated race or color from the use or occupancy of

> real estate for residential purposes do not violate the Fourteenth Amendment; but it is violative of the equal protection clause of the Fourteenth Amendment for state courts to enforce them."

By analogy, discriminations by professional associations are not unconstitutional, at least so far as the equal protection clause is concerned, but judicial enforcement would be. The analogy is not perfect, however, for in the case of restrictive covenants the judges had merely to be told where their duty lay. In the situation under discussion the judges know where their constitutional duty lies but, as members of their profession, they are in effect parties to the restrictive covenants they are supposed not to enforce. This brings in the problem of partiality, which was not present in the model.

At least, following the skeleton of the dictum in *Shelley* v. *Kraemer*, a two-part proposition can be stated that would more exactly apply to these circumstances:

> "The ethics of private associations which exclude injured patients or clients from medical treatment or legal services and from redress of grievances do not violate the Fourteenth Amendment; but it is violative of the equal protection clause of the Fourteenth Amendment for state judges to be swayed by those discriminatory ethics when adjudicating cases involving lawyers' wrongdoing."

Toward a solution

Judicial partiality in favor of lawyers may be unconstitutional but it is not obvious how it can be remedied when judges inescapably *are* lawyers, up to and including the Supreme Court justices. One does presume, however, that such partiality would be at a minimum at the pinnacle of all court systems.

The suggestion is made here that the Supreme Court might lend a hand to the discriminated-against outsider

via the writ of mandamus. The need is not for closely reasoned interpretations of law, but simply for giving a stabilizing nudge to judges who lean all the way over to protect their kind, denying to an outsider equal or *any* protection of the law.

Petitioner believes that her own case is ideal for testing this possibility.

It is ideal because, in the first place, the facts of attorney involvement in fraud were large and stark. Though it was medical interests that were served by a sham trial, it was the attorneys who staged it and this was after months of forethought.

It is also ideal because of the flagrance with which the Judges Mack, Pryor, and Pair befriended the wrongdoing attorneys. "We agree with them," they say, "that there is nothing much wrong with lawyers using half a dozen fraudulent documents to hoodwink a jury." (See Exhibit D.) Is it conceivable they would say the same if accountants or bankers had done such a thing?

Further, it is ideal because petitioner was pressing the question of intra-professional partiality upon the court's attention both before [8] and after [9] it rendered its decision.

If the Supreme Court were to refuse to condone this kind of judicial partiality in this glaring case—simply by instructing the judges to rule, one way or the other, on the issue presented to them for review—it would remind judges nationally that their duty is to dispense an even-

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[8] In her *Appellant's Reply Brief*.

[9] In the supporting memorandum to her *Motion for a Ruling on the Issue Presented for Review*.

handed justice under court rules and traditions, not to act as defense attorneys for members of their club.

The alternative would seem to be confirmation of an unspoken and *de facto* doctrine—that lawyers are privileged to practice fraud to any degree.

SUMMARY AND PRAYER

Petitioner moved to set aside a judgment for "fraud upon the court" perpetrated by all the attorneys in a case. The motion was denied on the procedural ground that such an allegation requires an independent action. Petitioner appealed that specific question: Post-trial motion or independent action?

The District of Columbia Court of Appeals refused to rule on the issue presented for review, holding that the type of fraud alleged by petitioner may not be complained of after one year.

Petitioner charges—nay, explains—that the judges concerned have abdicated their judicial duties to act as lawyers protecting lawyers. She maintains that such discrimination denies her and anyone else in like circumstances equal protection of the laws.

Believing that for every constitutional right denied there should be a remedy, she prays that the Supreme Court will issue to the Judges Mack, Pryor, and Pair a writ of mandamus directing them to rule on the issue presented to them for review: WHETHER THE SUPREME COURT DOCTRINE OF HAZEL-ATLAS, DEALING WITH FRAUD UPON THE COURT,

CALLS FOR A MOTION PROCEDURE OR AN INDEPENDENT ACTION.

Then she will proceed accordingly.

Respectfully submitted,

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